



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

Robert D. Church, Treasurer  
Capitol Foundation Campaign  
Committee  
P.O. Box 60  
Jackson, MS 39205

APR 10 1996

Identification Number: C00084368

Reference: Year End Report (7/1/95-12/31/95)

Dear Mr. Church:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year-to-date totals.

-Schedule H4 of your report discloses event year-to-date totals for administrative/voter drive disbursements which appear to be incorrect. Please amend your report to provide the correct event year-to-date totals.

-Schedule H3 discloses receipt of \$6,000 from your non-federal account for a fundraising event(s) which is listed as 100% non-federal on Schedules H2 and H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, a 100% non-federal fundraising event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

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The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

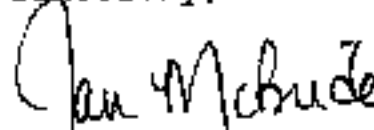
-Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A regardless of the amount. 2 U.S.C. §434(b)(3)(D)

-Please clarify all expenditures made for advertising on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Your report includes computer produced formats of Schedule A. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Jan McBride  
Reports Analyst  
Reports Analysis Division

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